

Policy and Programmes

HEAD OF SERVICE: Tim Oruye



planning.consultation@westoxon.gov.uk

CONTACT OFFICER: [REDACTED]

Tel: 01235 422422

Textphone: 18001 01235 422422

Abbey House, Abbey Close, Abingdon,
OXON, OX14 3JE

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Dear West Oxfordshire Planning Policy Team

Thank you for the opportunity to comment on your Local Plan 2043 Preferred Spatial Options Consultation. Your consultation considers four main issues; we set out our response to each of these below.

1. Extending the plan period to 2043: We note that you anticipate that your local plan will be adopted sometime during 2027. As such, you are proposing to extend the end date of your local plan to 31 March 2043 (to cover the required plan period of 15 years post-adoption).

2. Revised settlement hierarchy: We note that you are now proposing a five-tier settlement hierarchy, increased from four-tier, which categorises Principal Towns, Service Centres and Large, Medium and Small Villages.

3. Revised spatial strategy: We note your revised spatial strategy which commits to delivering a sustainable pattern of development through adopting a hierarchical approach to growth aligned with the settlement hierarchy, focussing growth along key strategic corridors, prioritising sustainable travel and infrastructure alignment, and protecting environmental and landscape assets.

4. Locations for housing and employment development:

Housing need: Extending the end date of the Local Plan will mean that your overall housing requirement will increase by around 1,800 homes, taking the total to 16,290 homes (905 dwellings per annum as identified by your housing needs assessment, for each of 18 years). We note that you are adding a 10% buffer of supply to take account of potential slippages, provide a greater degree of resilience and further capacity to accommodate any unmet housing need from Oxford City Council. Including the buffer increases your housing requirement to 18,000 homes.

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Housing supply: Your sources of housing supply include committed schemes, windfall development and allocated sites. When all sources of supply are taken into account, your total housing supply is 18,000 homes, which means that there is no unmet need expected to arise from your emerging plan, which we welcome.

Oxford unmet housing need: You anticipate reaching an agreed unmet need position with Oxford City Council by the time the West Oxfordshire Local Plan 2043 reaches Regulation 19 in Spring 2026. We will work collaboratively with you and all Oxfordshire districts to discuss how best to meet Oxford's evidenced unmet needs.

Employment: Your employment land need is currently expressed as a range from 4.4ha at the lower end to 31.4ha at the upper end. We note that these figures are derived from a 2041 plan end-date, and that you therefore need to make a pro-rata adjustment to calculate employment need to the end of March 2043. You say that this employment need is expected to be met through sites allocated in the emerging plan so you will have no expected unmet employment need, which we welcome.

Site allocations: We note your strategic site allocations carried forward from your adopted West Oxfordshire Local Plan 2031, and the new allocations made to meet your housing and employment need.

It is important that development proposed in West Oxfordshire would not result in an increased risk of flooding elsewhere, including in other authority areas. Parts of South Oxfordshire and Vale of White Horse are positioned downstream of rivers and watercourses in West Oxfordshire. Consideration needs to be given to both the individual and cumulative impacts of development on flood risk, including any possible cross-boundary impacts, and appropriate mitigation identified where needed. This should be considered both at the plan-making stage, through the Strategic Flood Risk Assessment, and through development management processes, through site specific Flood Risk Assessments.

We note that Area T - The Downs, Standlake is located close to an area identified within our SFRA as having high sensitivity to the cumulative impacts of development - the Thames (Leach to Evenlode) catchment. (Further detail can be found in appendix E of our Level 1 SFRA which is available to view in our [Joint Local Plan 2041 examination library](#) under the references CEQ11.0 and CEQ11.1.) We ask for further engagement as more information on flood risk becomes available, before providing further comments on this allocation.

We are concerned about potential impact on the local road network resulting from the Area T - The Downs, Standlake allocation, particularly on the operation of the northern arm of the A420 Kingston Bagpuize Roundabout. The interaction of West Oxfordshire's proposed site and our existing Kingston Bagpuize allocations will need to be reviewed

and relevant modal shift and highway infrastructure measures will need to be considered as part of the Infrastructure Delivery Plan measures for the site.

In summary, we note that there is no unmet need for housing and employment arising from the emerging plan, and we therefore support the housing numbers, employment land need and spatial strategy as currently envisaged. We will work collaboratively with you and all Oxfordshire districts to discuss how best to meet Oxford's evidenced unmet needs.

We note the proposed allocations, and wish to highlight the proximity of Land at the Downs, Standlake to the Vale of White Horse boundary and the need for further engagement with us as your evidence base forms. We request that you undertake detailed flood risk and transport assessments of the development proposed in your emerging plan to ensure that any potential impacts on our districts are properly understood and mitigated.

Thank you again for consulting us on your Local Plan 2043 Preferred Spatial Options Consultation, and we look forward to working together to engage in the next stages of your plan.

Yours sincerely

[Redacted Signature]

Senior Planning Policy Officer
South Oxfordshire District Council and Vale of White Horse District Council